

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

**DEBTORS' MOTION FOR LEAVE TO FILE A
REPLY¹ TO THE GOVERNMENT'S OPPOSITION TO DEBTORS'
MOTION FOR AUTHORIZATION TO SEEK DISCOVERY FROM DR.
ALAN C. WHITEHOUSE AND FOR A PROTECTIVE ORDER RELATING
TO PRODUCTION OF DOCUMENTS FROM DR. ALAN C. WHITEHOUSE**

The Debtors hereby request authority, to file a reply in further support of “W. R. Grace & Company’s Motion for Authorization to Seek Discovery From Dr. Alan Whitehouse and for a Protective Order Relating to Production of Documents from Dr. Alan C. Whitehouse” (Docket No. 11850) (the “Motion”).

On March 10, 2006, the United States Government (the “Government”) filed an opposition to the Motion (Docket No. 12034) (the “Opposition”). In the Opposition, the Government states the basis for its objection to Grace’s discovery request. The Debtors seek to file a brief Reply to address certain specific objections raised in the Opposition.

¹ The Court's chambers procedures do not permit replies absent an order entered upon a motion.

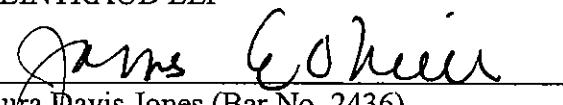
WHEREFORE, the Debtors respectfully request the entry of an Order granting it authority to file the Reply, which is attached hereto as Exhibit 1.

Dated: March 14, 2006

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Co-counsel for Debtors and Debtors in Possession

SO ORDERED this ____ day
of March, 2006

The Honorable Judith K. Fitzgerald
United States Bankruptcy Judge